

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO: <i>Ethicon Wave 8 cases listed in Exhibit A</i>	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO EXCLUDE THE GENERAL CAUSATION
OPINIONS OF DEFENSE EXPERT AHMET BEDESTANI, M.D.**

The Plaintiffs in this MDL respectfully move this Court for an order precluding Defense Expert Ahmet Bedestani, M.D., from testifying in any of the Ethicon Wave 8 cases. Dr. Bedestani, who has been retained to defend Ethicon's Prosima medical device, does not have the necessary expertise to give the opinions that he has proffered, and his opinions are not reliable under Rule 702 and the *Daubert* standard. Alternatively, the Court should at least exclude Dr. Bedestani's opinions on warnings, on design defect, and on whether the Prosima was the "state of the art" during its brief time on the market, lasting approximately three years.

The basis for this motion is further explained in the accompanying Memorandum in Support. Also supporting this motion are the following exhibits:

Exhibit A: List of Ethicon Wave 8 cases on which Dr. Bedestani is designated as a general expert

Exhibit B: General Expert Report of Ahmet Bedestani, M.D.

Exhibit C: Ahmet Bedestani deposition transcript

Exhibit D: Rosalyn Harcourt e-mail to Jonathan Meek, April 23, 2008, at ETH.MESH.05009194

Exhibit E: PA Consulting Group: *Investigating Mesh Erosion in the Pelvic Floor*, June 22, 2011

Exhibit F: Mark Cafone, *Seven Year Data for Ten Year PROLENE Study*, Oct. 15, 1992, at ETH.MESH.09888188

Dated: October 18, 2018

Respectfully submitted,

/s/ Jeffrey M. Kuntz

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed on October 18, 2018, using the Court's CM/ECF electronic filing system, thereby serving notice of the filing upon counsel for all parties to the case.

/s/ Jeffrey M. Kuntz

Attorney for Plaintiffs